

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:	:	Chapter 13
Amanda Gayle Martin aka Mandi Martin,	:	
aka Amanda G. Martin	:	
Jason Ryan Martin aka Jason R. Martin	:	Case No. 1:25-bk-00010
Debtor(s)	:	
	:	
Pennymac Loan Services, LLC	:	Answer to
Movant	:	Motion for Relief from Stay
	:	
v.	:	
	:	
Amanda Gayle Martin aka Mandi Martin, aka	:	
Amanda G. Martin	:	
Jason Ryan Martin aka Jason R. Martin	:	
Debtor(s)	:	
	:	
Jack N. Zaharopoulos	:	
Trustee	:	

DEBTORS' RESPONSE TO MOTION FOR
RELIEF FROM AUTOMATIC STAY OF SECURED CREDITOR

AND NOW, this 1st day of May, 2025, come the Debtors, Amanda Gayle Martin and Jason Ryan Martin, by and through counsel, the CGA Law Firm and E. Haley Rohrbaugh, Esquire, and do file the within response averring that:

1. Admitted.
2. Admitted.
3. Admitted.
4. Denied. Debtors are not privy to the assignment of the mortgage, and also, cannot respond to the date recorded in York County as the year has not been completed on the Motion.
5. Admitted.

6. Denied. Debtors admit to some missed payments, but are not privy to the exact amount of delinquency. Debtors will put any post-petition arrears in the Plan, but are also pursuing a loan modification.
7. Denied. The Debtors are unaware of the total necessary to reinstate the loan.
8. Denied. There is equity in the real estate which provides adequate protection to Movant.
9. Denied. This paragraph contains legal conclusions to which Debtors do not need to respond.
10. Denied. This paragraph contains legal conclusions to which Debtors do not need to respond.

WHEREFORE, it is requested that the relief sought be denied.

Respectfully submitted,
CGA Law Firm

/s/ E. Haley Rohrbaugh
E. Haley Rohrbaugh, Esquire
Sup. Ct. I.D. No. 323803
135 North George Street
York, PA 17401
(717)848-4900
Counsel for the Debtors